



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 9

75 Hawthorne Street
San Francisco, CA 94105

TALKING POINTS

DATE: July 1, 2014
SUBJ: South Bay VI Sites – Meeting with RPs & Regional Board
FROM: Melanie Morash, Remedial Project Manager
TO: Enrique Manzanilla, Director, Superfund Division

- **State/EPA Partnership** (*Enrique/John*)
 - Highlight strong 20+ year partnership with the Regional Board in overseeing these sites in the South San Francisco Bay Area (Stephen Hill, John Wolfenden) and EPA's full commitment to supporting our partner agency in propelling the vapor intrusion investigations forward
- **Recognize strong RP efforts in conducting VI evaluations and in-situ remedies to more aggressively remediate source areas** (*Enrique/John*)
 - Teledyne Semiconductor/Spectra-Physics (Mountain View, RPs TDY & Thermo Fisher) – comprehensive VI evaluations & mitigation work ongoing at residences & commercial buildings, and very successful bioremediation work to shrink their TCE plume
 - Advanced Micro Devices (various sites in Sunnyvale) – prompt response to EPA's requests to conduct VI evaluations at their buildings, thorough VI investigation & mitigation work ongoing at one affected commercial property, in-situ bioremediation making good progress towards meeting cleanup objectives
 - COE Study Area, which includes the HP Site & a Varian Site (Palo Alto) – high degree of professionalism and courtesy in engaging with Palo Alto property owners and residents to conduct indoor air sampling and investigate elevated detections, piloting in-situ treatment at the Varian facility
 - National Semiconductor Site (Sunnyvale, RP Texas Instruments) – prompt response to EPA's requests to conduct VI evaluations & proactive mitigation work in response to elevated findings
- **EPA's approach to regulating TCE solvent sites has changed following the Integrated Risk Information System (IRIS) 2011 re-assessment** (*direct to Dan/Alana*)
 - In requiring prompt response when above short-term screening levels, EPA Region 9 is making a strong risk management decision to be protective of public health and current indoor air exposures
 - The IRIS assessment identified non-cancer health effects that need to be incorporated into VI investigations
 - EPA continues to coordinate closely with cities and the County of Santa Clara (Public Health Dept. & Dept. of Env. Health) on our VI investigations at the South Bay sites

- **Recommendation to step-out to 5 ug/L TCE in shallow-zone groundwater** (*direct to Matt/Alana/Melanie*)
 - Ultimately it is the empirical data we continue to collect in the South Bay that supports the 5 ug/L step-out
 - Additionally, technical basis for evaluating VI pathway strong (modeling, regional and national research, regional expertise & empirical data findings)
 - Ongoing VI investigations in the South Bay continue to find unacceptable levels requiring mitigation at both residences & commercial buildings ranging from 5 to over 100 ug/L TCE
 - Driven by preferential pathways...we continue to investigate and learn how VI works
 - We note that at some sites a very low percentage of homes over even the highest concentration areas (over 50 ug/L for residential) have been sampled (53 out of approx. 600 buildings have been sampled, or approx 9%)
- **Process** (*John/Thelma*)
 - Our focus continues to include prevention of long-term cancer-causing exposures
 - We are being very thoughtful and systematic in our approach, using different lines of evidence that have been collected in this area to protect **against actual current exposures** or potential future ones.
 - CERCLA and the NCP fully authorize EPA to take early action to investigate and address potential or actual unacceptable exposures, pre RODAs.
- **Community Outreach** (*can direct to Alejandro/Alana [MEW] or Melanie [S. Bay]*)
 - VI is a priority issue for Region 9
 - EPA plans to broaden outreach in response to growing media and congressional interest in Silicon Valley TCE plumes - a larger town hall-type meeting this summer, with invitations to affected community members & the press
 - For the South Bay Sites, outreach has historically been door-to-door, directly to affected business/property owners & tenants
 - EPA has worked very closely with Regional Board & RPs to develop site-specific outreach materials
 - TDY/S-P, HP & Intersil/Siemens residential outreach letters
 - HP & Synertek Site commercial building fact sheets
 - Data summary letters to property owners